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***Co-Lead Class Counsel***

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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION**

IN RE: TOLL ROADS LITIGATION

PENNY DAVIDI BORSUK; DAVID  
COULTER; EBRAHIM E. MAHDA;  
TODD QUARLES; TODD  
CARPENTER; LORI MYERS; DAN  
GOLKA; and JAMES WATKINS on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

FOOTHILL/EASTERN  
TRANSPORTATION CORRIDOR  
AGENCY; SAN JOAQUIN HILLS  
TRANSPORTATION CORRIDOR  
AGENCY; ORANGE COUNTY  
TRANSPORTATION AUTHORITY;  
3M COMPANY; BRiC-TPS LLC;  
RHONDA REARDON; MICHAEL  
KRAMAN; CRAIG YOUNG; SCOTT  
SCHOEFFEL; ROSS CHUN;  
DARRELL JOHNSON; LORI  
DONCHAK; COFIROUTE USA, LLC;  
and DOES 3-10; inclusive,

Defendants.

Case No: 8:16-cv-00262-ODW(ADSx)

Hon. Otis D. Wright II

**PLAINTIFFS' NOTICE OF MOTION  
AND UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: December 10, 2020

Time: 10:30 a.m.

Location: Judicate West

55 Park Plaza Suite 400

Irvine, CA 92614

Special Master: Hon. Andrew J. Guilford (ret.)

[Filed Concurrently with Memorandum,  
Declarations and Proposed Order]

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on **December 10, 2020, at 10:30 a.m.**, or as soon thereafter as the matter may be heard, at Judicate West located at 55 Park Plaza Suite 400, Irvine, CA 92614 before the Honorable Andrew J. Guilford (ret.), Plaintiffs will and hereby do move for an order granting preliminary approval of two Settlements. One between Plaintiffs and Defendants Foothill/Eastern Transportation Corridor Agency, San Joaquin Hills Transportation Corridor Agency, Michael Kraman, Craig Young, Scott Schoeffel, Ross Chun, Rhonda Reardon (collectively “TCA”) and BRiC-TPS, LLC (“BRiC”). The second settlement between Plaintiffs and 3M Company (“3M”). **Please take notice that the hearing will be held remotely via Zoom.**

This notice and motion is made pursuant to Federal Rule of Civil Procedure 23(e) and on the grounds that the proposed Settlements are fair, reasonable and adequate and in the best interests of the class. The motion is unopposed by Defendants TCA, BriC and 3M, who are parties to the proposed Settlements.

This motion is based upon this notice and motion; the Memorandum of Points and Authorities submitted herewith; the attached Declarations of Helen I. Zeldes and Cameron R. Azari and attached exhibits thereto; the other records and pleadings filed in this action; and upon such other documentary and oral evidence or argument as may be presented to the Court at the hearing of this motion.

Date: November 4, 2020

SCHONBRUN SEPLOW HARRIS  
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HELEN I. ZELDES (220051)

By: /s/ Helen I. Zeldes  
Helen I. Zeldes

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**CO-LEAD CLASS COUNSEL**

1 Date: November 4, 2020

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10 Date: November 4, 2020

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***CO-LEAD CLASS COUNSEL***

1 Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), the above-listed filing attorney  
2 certifies that all other signatories listed, and on whose behalf this filing is submitted,  
3 concur in this filing's content and have authorized its filing.  
4

5 Date: November 4, 2020

SCHONBRUN SEPLOW HARRIS  
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HELEN I. ZELDES (220051)

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7  
8 By: /s/ Helen I. Zeldes

9 Helen I. Zeldes

10 ***CO-LEAD CLASS COUNSEL***  
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